

Friday, March 14, 2025 at 16:42:41 Eastern Daylight Time

Subject: Re: Fox News/Delancey: Discovery Responses
Date: Wednesday, August 7, 2024 at 2:13:29 PM Eastern Daylight Time
From: Alfredo J Pelicci
To: Katzenstein, Krissy, Kimberly A. Catala
CC: Evans, Paul, Jason Sunshine, Bryan Freedman, Summer Benson
Attachments: image004.png, image005.png, image001.png, image002.png, image003.png, image006.png, image007.png, image008.png, image009.jpg, AEK Krause Model Confidentiality and Protective Order-2.pdf

Krissy,

We are not agreeing to this broad confidentiality order. We can agree to something more aligned with the model orders we see in SDNY. Please find one attached. Feel free to make minor revisions to it.

Nevertheless, we did not agree that productions would be withheld until such order is entered. Tellingly, Fox is the only party that has done this. We will agree to hold all documents confidential until the order is ironed out and entered – enabling Fox to promptly produce. This must be immediately remedied or we will seek Court intervention. We are confident that the Court would see this as improper dilatory tactic.

Please let me know your availability for a meet and confer on Friday, Monday, or Tuesday.

Regards,



F I L I P P A T O S P L L C
 Employment Law, Litigation & ADR
Alfredo Pelicci
Managing Partner
 Pronouns: He/Him/His

📞 [\(212\) 202-0234](tel:(212)202-0234), ext. 402
 📩 Apellicci@filippatoslaw.com
 🌐 www.filippatoslaw.com



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From: Katzenstein, Krissy <Krissy.Katzenstein@bakermckenzie.com>
Date: Monday, July 29, 2024 at 7:59 AM
To: Alfredo J Pelicci <Apellicci@filippatoslaw.com>, Kimberly A. Catala <kcatala@filippatoslaw.com>
Cc: Evans, Paul <Paul.Evans@bakermckenzie.com>, Jason Sunshine <jsunshine@ftllp.com>, Bryan Freedman <bfreedman@ftllp.com>, Summer Benson <sbenson@ftllp.com>
Subject: RE: Fox News/Delancey: Discovery Responses

Alfredo,

No confidentiality stipulation has been entered in this matter. We have attached a draft for your and Mr. Wells' review. Please advise of any proposed revisions. Once entered, we will make our production.

Thank you,
 Krissy

Krissy Katzenstein
 Employment & Compensation
 Baker & McKenzie LLP
 452 Fifth Avenue
 New York, NY 10018
 United States
 Tel: +1 212 626 4364
 Cell: +1 202 999 9453
 Fax: +1 212 310 1600
krispy.katzenstein@bakermckenzie.com

**Baker
McKenzie.**

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From: Alfredo J Pelicci <Apellicci@filippatoslaw.com>
Sent: Thursday, July 25, 2024 3:01 PM
To: Katzenstein, Krissy <Krissy.Katzenstein@bakermckenzie.com>; Kimberly A. Catala <kcatala@filippatoslaw.com>
Cc: Evans, Paul <Paul.Evans@bakermckenzie.com>; Jason Sunshine <jsunshine@ftllp.com>; Bryan Freedman <bfreedman@ftllp.com>; Summer Benson <sbenson@ftllp.com>
Subject: [EXTERNAL] Re: Fox News/Delancey: Discovery Responses

Hi Krissy,

Correct me if I'm wrong, but we never received a document production from Fox Defendants. We'll be moving to compel on this next week if it is not remedied.

Regards,



Alfredo J. Pelicci

Partner

Pronouns: he/him/his

(914) 984-1111, ext. 402

apelicci@filippatoslaw.com

www.filippatoslaw.com

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From: Katzenstein, Krissy <Krissy.Katzenstein@bakermckenzie.com>

Date: Wednesday, July 3, 2024 at 5:01 PM

To: Alfredo J Pelicci <Apelicci@filippatoslaw.com>, Kimberly A Catala <kcatala@filippatoslaw.com>

Cc: Evans, Paul <Paul.Evans@bakermckenzie.com>, Jason Sunshine <jsunshine@ftllp.com>, Bryan Freedman <bfreedman@ftllp.com>, Summer Benson <sbenson@ftllp.com>

Subject: Fox News/Delancey: Discovery Responses

Counsel,

Please see the attached discovery responses.

Thank you,
Krissy

Krissy Katzenstein
Employment & Compensation
Baker & McKenzie LLP
452 Fifth Avenue
New York, NY 10018
United States
Tel: +1 212 626 4364
Cell: +1 202 999 9453
Fax: +1 212 310 1600
krispy.katzenstein@bakermckenzie.com

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